

SHER TREMONTE LLP

May 13, 2022

BY ECF

The Honorable Ronnie Abrams
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Yoel Abraham, et al.*, 20-CR-411 (RA)


Dear Judge Abrams:

We represent Yoel Abraham, a defendant in the above-referenced case. As discussed at the status conference on May 10, 2022, we write to respectfully request that the Court expand Mr. Abraham's travel restrictions to the continental United States so he can explore potential business opportunities in real estate outside of New York and New Jersey. Mr. Abraham has been on pretrial release since August 2020 and has complied with all conditions of release.

We have spoken to Mr. Abraham's pre-trial officer and the assigned AUSA and neither has any objections to this request.

Application granted.

SO ORDERED.



Ronnie Abrams, U.S.D.J.
May 13, 2022

Respectfully submitted,

/s/ Justine Harris
Justine A. Harris
Noam Biale
Maya Brodziak

CC: All counsel by ECF